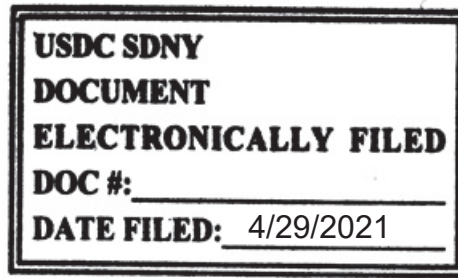


Andrew P. Yacyshyn
Direct Dial: (212) 508-6792
yacyshyn@thsh.com



900 Third Avenue, New York, NY 10022
Tel: (212) 508-6700 | Fax: (212) 371-1084
www.thsh.com | @THSHLAW

April 29, 2021

BY ECF

The Honorable Robert W. Lehrburger, U.S.M.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 18D
New York, NY 10007-1312
Tel: (212) 805-0248

Re: Request to Adjourn Initial Pretrial Conference
Roberto Miranda v. Lexington United LLC et al.
Case No.: 20-cv-10890-PGG-RWL

Dear Judge Lehrburger:

We are the attorneys for Lexington United LLC and Roni Mova, who we believe to be “John Doe Defendant,” in connection with the above-referenced wage and hour action.

We write with the consent of Plaintiff to respectfully request an extension of time to complete and file Your Honor’s Civil Case Management Plan and Scheduling Order and an adjournment of the initial pretrial conference currently scheduled for May 6, 2021, in light of United States District Judge Paul G. Gardephe’s Mediation Order filed April 22, 2021.

Pursuant to the Mediation Order, the parties are ordered to mediate prior to the FRCP 16(b) case management conference, and are further ordered, in the event the parties do not reach settlement at the mediation, to promptly meet and confer pursuant to FRCP 26(f) in preparation of the initial pretrial conference. Accordingly, in view of the Mediation Order, the parties hereby respectfully request that Your Honor adjourn the initial pretrial conference *sine die* and that the Court schedule such conference in the event that the mediation is unsuccessful.

Thank you, Your Honor, for your consideration in this matter.

Respectfully submitted,



Andrew P. Yacyshyn

Honorable Robert W. Lehrburger
April 29, 2021
Page 2 of 2

cc: Mohammed Ahmed Gangat
Gangat LLC
270-05 79 Avenue
New Hyde Park, NY 11040
(718) 669-0714
Email: mgangat@gangatllc.com
Attorney for Plaintiff
[BY ECF]

SO ORDERED:

4/29/2021

A handwritten signature in black ink, appearing to be 'R. Lehrburger', written over a horizontal line.

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE